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7	Attorneys for Plaintiff,		
8	Janet Rouse		
9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
11	JANET ROUSE, an individual,	CASE NO.: 2:19-cv-01823-JAD-EJY	
12	Plaintiff,	STIPULATION AND ORDER TO	
13	VS.	EXTEND DEADLINE FOR PLAINTIFF TO RESPOND TO DEFENDANT STAFF	
14		MANAGEMENT, LLC MOTION TO DISMISS	
15	STAFF MANAGEMENT, LLC a foreign limited		
16	liability company; ETHEL M. CHOCOLATES, LLC., a domestic limited liability company;		
17			
18	Defendants.	(First Request)	
19		(First Request)	
20			
21	IT IS HEREBY STIPULATED by and between Plaintiff Janet Rouse ("Plaintiff"), through her		
22	counsel Philip J. Trenchak, Esq. of Mullins & Trenchak, Attorneys at Law, and Defendant Staff		
23	Management, LLC ("Defendant"), through its counsel Sarah J. Odia, Esq. of Payne & Fears, LLP., that		
24	Defendant shall have up to and including Thursday, January 30, 2020, in which to respond to		
25 26	Defendant's Motion to Dismiss First Amended Complaint [Dkt. 30]. This Stipulation is submitted and		
27	based upon the following:		
28	1. That Defendant's answer or response is currently due on January 16, 2020.		
	1		

1	2.	2. That this is the first request for an extension of time for Plaintiff to respond to Defendant's		
2		Motion to Dismiss First Amended Complaint.		
3	3.	That such an extension is necessary because P	laintiff's Counsel requires additional time to	
4		investigate facts that will allow for an informe	ed response to the Motion to Dismiss.	
5	4.	That such an extension is necessary due to Pla	intiff's Counsel being overwhelmed with	
6 7		litigation deadlines.		
8	5.	That this request is made in good faith and not	t for the purpose of delay.	
9	6.	That nothing in this Stipulation, nor the fact of	f entering to the same, shall be construed as	
10		waiving any claim and/or defense held by any	party.	
11				
12	DATED this 15 th day of January, 2020.			
13 14				
15	MULLIN	S & TRENCHAK, ATTORNEYS AT LAW	PAYNE & FEARS, LLC	
16		J. Trenchak	_/s/ Sarah J. Odia	
17	Nevada B	renchak, Esq. ar No. 9924	Sarah J. Odia, Esq. Nevada Bar No. 11053	
18		aryland Pkwy. s, NV 89104	6385 S. Rainbow Blvd., Suite 220 Las Vegas, Nevada 89118	
19 20				
21				
22	<u>ORDER</u>			
23	IT IS SO ORDERED:			
24				
25			United States District Court Judge	
26 27			Dated: January 16, 2020.	
28				